



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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RILEY

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Governor

Robert M. Summers, Ph.D.
Secretary

Anthony G. Brown
Lieutenant Governor

26 September 2012

Mr. Lawrence M. Holley, Facility Manager
National Archives & Records Administration
8601 Adelphi Road
Room 2320
College Park, MD 20740-6001

Mr. Lawrence M. Holley,

I am writing as a follow up to our recent inspections with NARA staff and their consultants to identify concerns regarding compliance with the State Discharge Permit. When Inspector John and I met with your staff on August 8, 2012, we relayed to you concerns we had about; your failure to submit Discharge Monitoring Reports (DMR's), failure to monitor for all effluent parameters, failure to correctly report permit excursions with copper and zinc limits, failure to provide MDE, when requested, with documentation related to sample collection, analysis and the identity of the laboratory doing the analysis, and failure to perform bio-monitoring of the effluent to determine toxicity, all required by the State Discharge Permit. Mr. Johnathan Mack indicated at that time that you were meeting with your consultant, Nalco on August 9, 2012 to discuss the parameters being tested and the units the lab was using to report its results. You advised us you would email us the results of that meeting. However, to date, we have not received a response.

MDE staff once again met with you and your staff on September 6, 2012. At that meeting, Mr. Jonathan Mack agreed to email information regarding sample collection and analysis. Again, we have not received that requested information.

Further, during each MDE visit, NARA staff appeared unsure and were unable to conclusively point to the actual discharge point. It was evident that Outfall 001 was and had not recently discharged despite NARA's admission that 25-40,000 gallons of non-contact cooling water is discharged daily, particularly during the warm months. It is imperative that NARA accurately identify the actual discharge location and demonstrate that to MDE. It may be that the discharge is currently being directed to the sanitary sewer making the State Discharge Permit moot.

Once NARA has accurately identified the actual discharge location, NARA should consider the following two options in order to gain compliance;

1. If the discharge is directed to the sanitary sewer, disconnect the discharge line to Outfall 001. MDE will need to verify the actual discharge location and that Outfall 001 is no longer in service. We also need WSSC to provide MDE with documentation that they are willing to

accept the non-contact cooling water. Once these tasks have been completed, you are advised to submit a request to terminate your MDE discharge permit.


2. If the discharge is or will be directed to Outfall 001, please submit information regarding how NARA will comply with the effluent limits, including copper and zinc.

At this time, NARA is in significant noncompliance with the State Discharge Permit. The case has been referred to the Enforcement Division and is being discussed with EPA.

Please provide to MDE, within 30 days, a written response that identifies what NARA intends to do address the above noted violations and ensure that this discharge maintains compliance with the State Discharge Permit. If you have any questions regarding this letter or the steps you must take in order to gain compliance, please contact me at (301) 665-2850.

Thank you for your cooperation in this matter.

Sincerely,


James F. Craig, District Manager
Western Division
Compliance Program